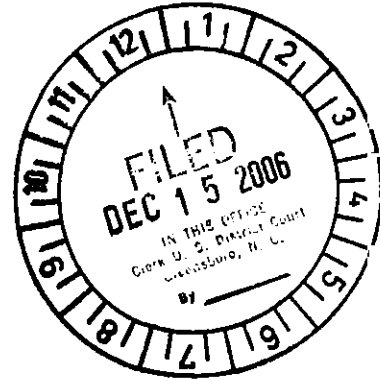


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA : 1:06CR468-1  
: :  
V. : :  
: :  
RICHARD NORMAN WILLIAMS : FACTUAL BASIS

COMES NOW, the United States of America, by and through Anna Mills Wagoner, United States Attorney, and shows unto the Court the following factual basis in support of the defendant's plea of guilty to the charges herein:

In or about the summer of 2002, RICHARD NORMAN WILLIAMS, using the screen name John Wisham, began chatting with D.H., an eleven year old female juvenile via computer. Williams contacted D.H. via computer, regarding meeting her for a sexual encounter. On or about February 25, 2003, Richard Norman Williams met D.H., the juvenile who had now attained the age of 12, and drove her to the Guilford Courthouse National Military Park. While on the grounds of the Park, and within the special maritime and territorial jurisdiction of the United States, the defendant engaged in sexual acts as defined in 18 U.S.C. §2246(2) with the minor.

On or about August 5, 2003, RICHARD NORMAN WILLIAMS, used a facility of interstate commerce, that is, his computer via the Internet, to persuade, induce, and entice D.H., a person who had not attained the age of 18 years, to engage in sexual activity for which a person could be charged with a criminal offense under

the laws of the State of North Carolina, that is, first degree sexual offense, in violation of North Carolina General Statute 14-27.4. On the morning of August 5, 2003, RICHARD NORMAN WILLIAMS communicated by computer via the Internet with D.H., a minor, regarding his seeing her later that day with the intent to engage in sexual activity. Later that day, WILLIAMS drove to the residence of the minor. While at the residence, WILLIAMS and the minor engaged in sexual activity for which a person could be charged with a criminal offense as defined by N.C.G.S. § 14-27.4. At the time of the commission of the instant offense, the minor was twelve years old, and the defendant was over the age of twelve and at least four years older than the minor. On August 5-6, 2003, WILLIAMS further communicated by computer via the Internet with D.H., a minor, regarding the sexual activity in which they had engaged. Specifically, WILLIAMS and the minor discussed the sexual activity which occurred on the morning of August 5, 2003.

Between July 23, 2004, and August 10, 2004, RICHARD NORMAN WILLIAMS, came to D.H.'s residence in Greensboro, North Carolina. He took photographs of her engaging in sexually explicit conduct as that term is defined in 18 U.S.C. §2256. Later, WILLIAMS uploaded the digital photographic images from his camera to his computer and sent them to D.H. over the Internet during their IM's (instant messaging chats) or via email. WILLIAMS instructed

D.H. to delete their chats, emails and pictures so that there would be no record of their relationship.

Agents conducted a search of the residence and business of RICHARD NORMAN WILLIAMS on January 31, 2006. Agents recovered a silver Kodak DC4800 digital camera, serial number KJCAB03601222 from the business. A forensic examination was done on the recovered computer equipment. Two thumbnail images were recovered under the Documents and Settings\Chip Williams\My Documents\Thumbs.db. The images were numbered DCP\_2131.jpg and DCP\_2132.jpg. These images were also named with the victim's first name[]-1.jpg and[]-2.jpg. These images had been uploaded to his computer on August 10, 2004. Analysis of other digital images located on his camera showed that the images of the minor, D.H. were created between July 22, 2004, and August 8, 2004. The Kodak DC4800 digital camera referenced above was not manufactured in the State of North Carolina. Thus, the visual depictions were produced using materials that had been mailed, shipped or transported in interstate or foreign commerce.

This the 14<sup>th</sup> day of December, 2006.

Respectfully submitted,

ANNA MILLS WAGONER  
United States Attorney



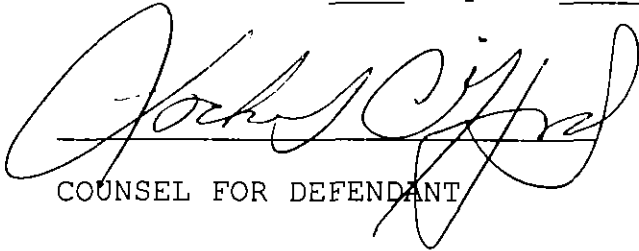
LISA B. BOGGS  
Assistant United States Attorney  
NCSB #10635

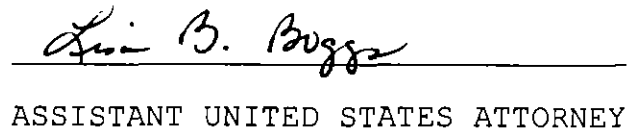
P. O. Box 1858  
Greensboro, NC 27402  
336\333-5351

STIPULATION

The United States of America and the defendant, by and through their respective counsel, do hereby stipulate and agree that the foregoing FACTUAL BASIS is a fair and accurate account of the facts which the government would present if this case were called for trial. Both defendant and defendant's counsel have been provided a copy of the attached FACTUAL BASIS, and defendant has either read, or had read to him/her the contents of this statement. Any changes, alterations or deletions have been noted on the filed copy, and any such changes are acknowledged by the initials of all parties.

This the 16<sup>th</sup> day of December, 2006.

  
COUNSEL FOR DEFENDANT

  
ASSISTANT UNITED STATES ATTORNEY

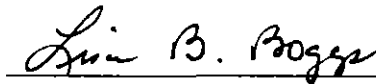
CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Factual Basis was served upon the person hereinafter named, either personally or by placing a copy of the aforementioned document in the United States Mail addressed as follows:

Addressee:

Locke T. Clifford  
CLIFFORD CLENDENIN & O'HALE, LLP  
415 W. Friendly Avenue  
Greensboro, NC 27401

This the 14th day of December, 2006.



Lisa B. Boggs  
Assistant United States Attorney  
United States Attorney's Office

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